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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re: | : Chapter 11 Case No. |
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| MOTORS LIQUIDATION CORP., et al., | : 09-50026 (REG) |
| | : |
| f/k/a GENERAL MOTORS CORP., et al., | : (Jointly Administered) |
| | : |
| Debtors. | : |
| | : |
| -----X | |

**MOTION PURSUANT TO FED. R. BANKR. P. 9006(c) AND LOCAL RULE 9006-1(b),
TO SHORTEN NOTICE PERIOD WITH RESPECT TO IUE-CWA'S
MOTION PURSUANT TO 11 U.S.C. §§ 105 AND 363(b) TO
APPROVE ASSIGNMENT OF CLAIM OF IUE-CWA TO A VEBA TRUST**

TO THE HONORABLE ROBERT S. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

PRELIMINARY STATEMENT

1. By this motion, (the "Motion to Shorten Time"), IUE-CWA, Industrial Division of the Communications Workers of America, AFL-CIO, CLC ("IUE-CWA"), seeks entry of an order, pursuant to Fed. R. Bankr. P. 9006(c) and Local Rule 9006-1, that the court shorten the notice period by one day for the IUE-CWA's Motion Pursuant to 11 U.S.C. §§ 105 and 363(b), to Approve Assignment of Claim of IUE-CWA to a VEBA Trust, dated December 2, 2010 (the "Assignment of Claim Motion") that IUE-CWA seeks to schedule to be heard on December 15, 2010 at 2:00 p.m. (Eastern Time). A proposed order is attached as Exhibit A.

2. Pursuant to the Assignment of Claim Motion, IUE-CWA seeks approval of an agreement between IUE-CWA and the IUE-CWA/GM Bankruptcy Claim Trust (“Trust”) for the IUE-CWA to transfer its percentage share of the Allowed Claim set forth in the Settlement Agreement Between and Among GMCo/MLC-IUE-CWA and USW Regarding Retiree Health Care, Life Insurance Pension Top-up, and Modification and GMCO Assumption of MCL-IUE-CWA CBA (“Settlement Agreement”) to the Trust.

3. This court approved the Settlement Agreement on November 12, 2009. (Docket No. 4433.). According to the Approval Order, the IUE-CWA percentage share of the entire Allowed Claim of one billion dollars is 79.39%. (Docket No. 4433, Ex. A.)

4. The organizational meeting of the Trust was held on November 29, 2010. At this meeting, the Trustees retained the firm of Kennedy, Jennik & Murray, P.C. as counsel for the Trust. The Trustees also approved the Trust Agreement, the Loan Agreement, the Transfer of Claim Agreement and the agreement with Independent Fiduciary Services, Inc. (“IFS”), an organization which will assume fiduciary responsibility for handling the IUE-CWA percentage share of the Allowed Claim. In order to give IFS the ability to make decisions regarding the disposition of the IUE-CWA percentage share of the Allowed Claim as soon as possible, IUE-CWA seeks to shorten the time required to serve the Motion by one day. The motion is being served on December 2, 2010 for a hearing on December 15, 2010 at 2:00 p.m. (Eastern Time), a date and time at which other matters in this case are scheduled to be heard. (Docket Nos. 7762, 7778, 7779, 7780.) Since the Motion seeks to implement the terms of the Settlement Agreement which has been already approved by this Court, it is not expected that there will be objections to the Assignment of Claim Motion.

BASIS FOR RELIEF REQUESTED

5. Local Rule 9006-1(b) of the Bankruptcy Court for the Southern District of New York provides: “Unless the Court orders otherwise, all ... motion papers shall be served at least 14 days before the return date.” Fed. R. Bankr. P. 9006(c) provides, in pertinent part, as follows: [W]hen an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.”

6. IUE-CWA seeks a minimal shortening of the time, one day, to serve the Assignment of Claim Motion prior to the return date. The date on which IUE-CWA seeks to have the Assignment of Claim Motion heard is December 15, 2010, a date on which other matters are scheduled. If the Motion to Shorten Time is denied, the next date scheduled for hearings in this case is January 6, 2011. Reducing the time of notice for the hearing by one day will not interfere with the interests of any party since it is not expected that any party will object to the Assignment of Claim Motion.

7. Based on the forgoing, IUE-CWA submits that cause exists to shorten the notice period with respect to the Assignment of Claim Motion.

JURISDICTION

8. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

NOTICE

9. Pursuant to Fed. R. Bankr. P. 9006(c)(1), the court may shorten time without notice. Accordingly, no notice of this Motion to Shorten Time has been given.

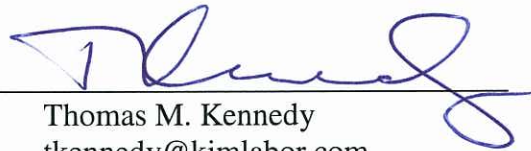
10. No previous request for the relief sought herein has been made by IUE-CWA to this or any other Court.

WHEREFORE, IUE-CWA respectfully requests that the Court approve the shortened notice period of one day, requested herein, and grant IUE-CWA such other and further relief as the Court deems just and proper.

Dated: New York, NY
December 2, 2010

Respectfully submitted,

KENNEDY, JENNIK & MURRAY, P.C.
Attorneys for IUE-CWA

A handwritten signature in blue ink, appearing to read 'Thomas M. Kennedy', is written over a horizontal line.

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